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March 22, 2023

Via ECF
Honorable Colleen McMahon
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Derrick Latimore
Case No. 22-cr-82 (CM)

Dear Judge McMahon:

I represent Derrick Latimore in the above matter. Mr. Latimore is requesting a modification of his bail conditions from home confinement to a curfew enforced by electronic monitoring with the added one condition that he is not to go within one block of 3671 Broadway, New York, NY 10031, with the hours set at the discretion of Pretrial Services. Pretrial Services, Jonathan Lettieri, has no objection to this request and AUSA Ashley Nicholas consents on the condition that his bond be modified to include that he not be permitted within one block of: 3671 Broadway, New York, NY 10031. Therefore, we respectfully request a modification to Mr. Latimore's bail from home detention, to curfew.

Should Your Honor grant this request, Mr. Latimore will arrange his travel and time to leave and return to his home with Officer Lettieri. Your Honor's time and consideration of this request is greatly appreciated.

Respectfully submitted,
s/ Lorraine Gauli-Rufo,
Lorraine Gauli-Rufo,
Attorney for Derrick Latimore

cc: Ashely Nicholas, AUSA
Jonathan Lettieri, PTS

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